

## UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee



United States of America  
v.  
AARON EUGENE BJARNASON

Case No. 22-mj-4285

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 10, 2022 to March 11, 2022 in the county of Montgomery in the  
Middle District of Tennessee, the defendant(s) violated:

## Code Section

18 U.S.C. §§ 2251(a) and (e)  
18 U.S.C. §§ 2261A(2)(B), 2261B  
18 U.S.C. § 875(d)

## Offense Description

Production of Child Pornography  
Cyberstalking  
Threatening Communications with Intent to Extort

This criminal complaint is based on these facts:

SEE ATTACHMENT

☐ Continued on the attached sheet.

e-signed//Zachary D. Perkins

Complainant's signature

FBI Special Agent Zachary D. Perkins

Printed name and title

by telephone in compliance with  
FRCrP 4.1.

Sworn to before me and signed in my presence.

Date: August 15, 2022City and state: Telephonically

*Alistair E. Newbern*  
Judge's signature

S. Magistrate Judge Alistair E. Newbern

Printed name and title

## STATEMENT IN SUPPORT OF CRIMINAL COMPLAINT

I, Zachary D. Perkins, being first duly sworn on oath, states as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since 2021. Prior to becoming a Special Agent, I was employed as a Police Officer for the city of Escondido, California for eight years. During those years of employment, I conducted hundreds of criminal investigations. I obtained a bachelor's degree in Criminology from California State University Fresno. I currently am assigned to the FBI's Memphis Division, Clarksville, Tennessee Resident Agency, where I am assigned to work a wide variety of criminal matters, including violent crimes against children. As a federal agent, I am authorized to investigate and assist in the prosecution of violations of laws of the United States and to execute search warrants and arrest warrants issued by federal and state courts.

2. This affidavit is submitted in support of a Criminal Complaint for the arrest of **AARON EUGENE BJARNASON** for the following offenses: Production/Attempted of Child Pornography in violation of 18 U.S.C. §§ 2251(a) and (e); Cyberstalking in violation of 18 U.S.C. §§ 2261A(2)(B) and 2261B; and Threatening Communications with Intent to Extort in violation of 18 U.S.C. § 875(d) as follows:

3. From at least on or about March 10, 2022, and continuing through on or about March 11, 2022, in the Middle District of Tennessee, the District of Oregon, and elsewhere, **AARON EUGENE BJARNASON** attempted to and did employ, use, persuade, induce, entice, and coerce Minor Victim 2<sup>1</sup>, who was then approximately 14 years old, to engage in sexually

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<sup>1</sup> Per 18 U.S.C. § 3509, I have partially redacted personally identifying information, such as names of minor victims, minor victim's social media account names, and dates of birth, from this affidavit. Unless otherwise noted, this information is known to me and can be made available to the Court.

explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, transported in and affecting interstate and foreign commerce, and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of 18 U.S.C. §§ 2251(a) and (e);

4. From at least on or about March 10, 2022, through at least on or about March 11, 2022, in the Middle District of Tennessee, the District of Oregon, and elsewhere, **AARON EUGENE BJARNASON** did, with the intent to kill injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, to wit Minor Victim 2, use the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause substantial emotional distress to Minor Victim 2, all in violation of 18 U.S.C. §§ 2261A(2)(B) and 2261B; and

5. From at least on or about March 10, 2022, through at least on or about March 11, 2022, in the Middle District of Tennessee the District of Oregon, and elsewhere, **AARON EUGENE BJARNASON**, with intent to extort from any person, firm, association, or corporation, any money or other thing of value, did transmit in interstate or foreign commerce any communication containing any threat to injure the property or reputation of the addressee or of another, or a threat to accuse the addressee or any other person of a crime, all in violation of 18 U.S.C. § 875(d).

6. The following information contained in this affidavit is based on my training and experience, my personal participation in this investigation and information provided to me by other law enforcement officials and public/private entities. Unless otherwise indicated, where I have referred to written or oral statements, I have summarized them in substance and in part, rather than verbatim. Not all facts of the investigation known to me are contained herein, only those necessary to establish probable cause for the arrest of **AARON EUGENE BJARNASON**.

### **STATEMENT OF PROBABLE CAUSE**

#### **Minor Victim 1**

7. On May 18, 2022, the FBI was contacted by the mother of Minor Victim 1, who reported her sixteen year old daughter was the victim of online sextortion. Minor Victim 1 resides in Victoria, Minnesota, in the District of Minnesota. Initial information provided by the mother of Minor Victim 1 and disclosed during a forensic interview of Minor Victim 1 revealed that a subject, (later identified as **AARON EUGENE BJARNASON**) known to Minor Victim 1 as “Matthew,” contacted her on the social media applications Instagram and Snapchat using the usernames forrex012 and matthew\_erns7 respectively. **BJARNASON** claimed to be eighteen years old and enticed Minor Victim 1 to create and send him nude photos and videos of herself masturbating in exchange for money. Minor Victim 1 sent the images and videos requested by **BJARNASON**. After **BJARNASON** failed to send Minor Victim 1 payment in exchange for the images and videos, Minor Victim 1 told **BJARNASON** she was sixteen years old and that she no longer wanted to send him videos and images. **BJARNASON** demanded Minor Victim 1 send additional videos of herself based on **BJARNASON**’s directions. For example, **BJARNASON** told Minor Victim 1 to record herself putting on several different outfits including a swimsuit, bra and

underwear, a skirt, and a t-shirt with shorts, and taking them off to expose her naked body. **BJARNASON** also directed Minor Victim 1 to record pornographic videos of herself where she referred to herself as a “slut” and called **BJARNASON** “daddy.” **BJARNASON** sent Minor Victim 1 several pornographic videos as examples of what he wanted her to record herself doing. **BJARNASON** sent Minor Victim 1 screen recorded lists of her social media contacts and threatened to send pornographic images of her to the accounts on the lists if she did not continue to send him the pornographic videos he requested. Minor Victim 1 estimated that she sent **BJARNASON** 30-40 videos at his direction which depicted her exposed genitals, posing naked, masturbating, and simulating fellatio with her fingers. The videos were recorded on Minor Victim 1’s cell phone and sent to **BJARNASON** using Instagram and Snapchat. Minor Victim 1 described **BJARNASON**, after observing him during an interaction on a video chat, as an Asian or half-Asian young adult male with dark hair and a slim face.

#### **Snapchat Account Search Warrant Results**

8. On June 22, 2022, a search warrant was issued in Carver County District Court in Minnesota for the contents of Snapchat ID matthew\_erns7. The warrant covered Snap, Inc. records for the period of account creation to the present pertaining to state child pornography offenses. The search warrant was submitted by Carver County Sheriff's Office Detective Alex Bujalski. Detective Bujalski provided the information returned from Snap, Inc. to FBI SA Mathew Vogel, who reviewed it and discovered the user controlling the account was engaged in several chats in which minor females were being extorted to produce pornographic content. Within the subject’s Snapchat account were pornographic videos of Minor Victim 1 sent by Minor Victim 1 via Snapchat along with text conversations which corroborated above statements provided by Minor

Victim 1. In one chat with Snapchat account bXXXXXXXXXb77 [redacted], the user sent two photos that he claimed were of himself. The photos depicted a young Asian adult male with dark hair. One photo was of the subject sitting in his car and showed his face. The other photo was the subject taking a full body picture of himself in a mirror wearing no shirt. The subject depicted in the photographs matched the description provided by victim Minor Victim 1.

9. Included in **BJARNASON**'s Snapchat account was communications with Snapchat username hXXXXXXXXX7 [redacted], who was later identified as Minor Victim 2. On March 10 and March 11, 2022, Minor Victim 2 sent numerous images and videos to **BJARNASON**, which were stored in **BJARNASON**'s Snapchat account, including videos depicting her naked and masturbating. The videos depict Minor Victim 2 naked and displaying her vagina and anus to the camera. Some of the images and videos depict the digital penetration of her vagina. Minor Victim 2 is heard speaking in some of the videos directing the content to "daddy" and asking the recipient to "please cum down my fourteen-year-old throat daddy." For example, on March 10, 2022 at 23:36:03 UTC, hXXXXXXXXX7 [redacted] sent a video approximately 31 seconds in duration in which Minor Victim 2 is seen posing naked kneeling on the floor and says, "please cum down my fourteen-year-old throat daddy" and opens her mouth to show spit collected on her tongue. In later videos, Minor Victim 2 is seen sticking fingers down her throat to induce vomiting and Minor Victim 2 says, "daddy, this is for you. It will please you" and "I'm [Minor Victim 2's name] and I'm daddy's fourteen-year-old little slut." There are nine such videos.

10. On or about July 25, 2022, SA Zachary Perkins contacted Minor Victim 2 at her residence in the Middle District of Tennessee and confirmed her identity. A forensic interview was conducted by a FBI Child and Adolescent Forensic Interviewer (CAFI) with Minor Victim 2. In

the interview Minor Victim 2 stated she began talking to **BJARNASON**, who she knew as “Matthew,” sometime between January and March of 2022. The following is a summary of statements by Minor Victim 2 and is not verbatim unless explicitly noted. According to Minor Victim 2, communication with **BJARNASON** started late in the evening and ended in the early morning of the next day. **BJARNASON** first made contact with Minor Victim 2 on the social media application Yubo while she was at her friend’s house in Clarksville, Tennessee, in the Middle District of Tennessee. Minor Victim 2 had been drinking alcohol that evening. The conversation transitioned from Yubo to Facetime where Minor Victim 2 told **BJARNASON** that she was 14-years-old. Minor Victim 2 got completely naked while video chatting with **BJARNASON** on her cell phone. **BJARNASON** screen recorded an image of Minor Victim 2 while she was naked, then sent an image of her Instagram followers list to her, and threatened to distribute the screen recording if she did not produce sexually explicit videos of herself doing and saying exactly as he directed. Minor Victim 2 went into the bathroom at her friend’s house and followed **BJARNASON’S** directions to create and send videos of herself taking her clothes off, pretending she was getting out of the shower, touching her breasts and vagina, gagging herself with her fingers, and repeatedly saying that she was 14-years-old. CFI showed Minor Victim 2 printed still images from the previously described videos found in **BJARNASON’S** Snapchat account. Minor Victim 2 positively identified herself in each of the image, and stated she recognized the images were from the videos **BJARNASON** instructed to create and send to him. Minor Victim 2 saw **BJARNASON** during a video chat and described him as an Asian male. Minor Victim 2 could not remember **BJARNASON’S** Snapchat username, but stated that it was likely stored in the listed of blocked usernames on her Snapchat account. With consent granted

from Minor Victim 2's father and mother, SA Perkins later reviewed Minor Victim 2's Snapchat account on her cell phone and discovered the Snapchat username "matthew\_erns7" was on the list of blocked accounts.

### **BJARNASON's Public Social Media Presence**

11. SA Matthew Vogel located publicly available social media accounts in **BJARNASON's** name and bearing his images. These include Instagram ID aaronbjarnason and Facebook ID aaron.bjarnason.79. Images from these social media accounts appeared to be of the same subject pictured in the above mentioned photos sent by the Snapchat username matthew\_erns7 to bXXXXXXXXXX7 [redacted].

### **Summary of Records Obtained Pursuant to Subpoenas**

12. In response to an administrative subpoena, Meta Platforms provided subscriber and registration records and IP logs for Instagram ID 50936021565 (J), Instagram ID 884365899 (aaronbjarnason), and Facebook ID aaron.bjarnason.79. Those records reflect the following information:

- a. Instagram ID 50936021565 (forrex012)
  - i. Registered Email: togosallday@gmail.com
  - ii. IP logs show the account was accessed on IP address 67.171.177.253
- b. Instagram ID aaronbjarnason
  - i. Unique ID: 884365899
  - ii. Registered Email: aaronbjarnasonths@gmail.com

- iii. Phone: XXX-XXX-7329 (Verified)<sup>2</sup>
  - iv. IP Logs reflect usage on IP addresses in the vicinity of Portland, Oregon, including 67.171.177.253.
- c. Facebook ID aaron.bjarnason.79
- i. Registered Email Addresses: aaronbjarnasonths@gmail.com
  - ii. Phones: XXX-XXX-7329<sup>3</sup>, XXX-XXX-3417<sup>4</sup>

13. In response to an administrative subpoena, Snap, Inc. provided subscriber and registration records and IP logs for Snapchat ID matthew\_erns7. Those records reflect the following information:

- i. Display Name: Matthew
- ii. Telephone Number: XXX-XXX-8433 (Verified) <sup>5</sup>
- iii. User-Agent: The account was accessed on an iPhone 12, iPhone XS, and an iPad Pro.
- iv. IP Logs: IP logs show the account was accessed from IP address 67.171.177.253 geolocated in the vicinity of Portland, Oregon and a series of Verizon Wireless IPs.

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<sup>2</sup> In order to ensure accounts contain correct information, service providers often send a code to a user-provided phone number or email address. If the user validates access to the phone or account by entering the code, the facility is often registered as “verified” or “confirmed.”

<sup>3</sup> This is the same phone number used to register the aaronbjarnason Instagram ID. The number appears to have been used before **BJARNASON** turned 18.

<sup>4</sup> This is the same number assigned the Verizon IP addresses used to access matthew\_erns7 discussed below.

<sup>5</sup> The telephone number used here is a Voice over Internet Protocol service.

14. In response to an administrative subpoena, Comcast Communications provided records about IP address 67.171.177.253. At the relevant date and time, the IP address was assigned to a subscriber at a Portland, Oregon apartment where **BJARNASON** is known to live. For example, according to U.S. Bank records, **BJARNASON**'s residence address is the same as the Comcast subscriber address.

15. In response to an administrative subpoena, Verizon provided records about the phone account assigned the aforementioned Verizon IP addresses. Those IP addresses were assigned to telephone number XXX-XXX-3417. The subscriber is a person believed to be a close relative of **BJARNASON** and **BJARNASON** is listed as the "contact" person on the account. Verizon records show the device assigned this number is an Apple iPhone 12, one of the devices used to access Snapchat ID matthew\_erns7. The "contact name" on the account is **AARON BJARNASON**. Based on publicly available social media posts and public records databases, I believe the subscriber for the account is likely a family member of **BJARNASON**.

16. In response administrative subpoenas, Google LLC provided records associated with the Google accounts connected to **BJARNASON**. Google records reflect IP creation address for [togosallday@gmail.com](mailto:togosallday@gmail.com) is 67.171.177.253, which the following subscriber and registration information:

- a. [togosallday@gmail.com](mailto:togosallday@gmail.com)
  - i. Creation IP: 67.171.177.253

- b.      aaronbjarnasonths@gmail.com
  - i.          Name: Aaron Bjarnason
  - ii.        Created: October 16, 2013
  - iii.       Recovery SMS: XXX-XXX-3417

17.      In response to a federal grand jury subpoena, U.S. Bank provided records for bank accounts in **BJARNASON**'s name. U.S. Bank records show **BJARNASON**'s current address is the address listed on the Comcast Communications records for IP addresses used to access many of the TARGET ACCOUNTS. U.S. Bank records also show **BJARNASON**'s cell phone number is XXX-XXX-3417 and email address is aaronbjarnasonths@gmail.com. **BJARNASON** has two U.S. Bank accounts with account numbers ending -8848 and -8720. This information is consistent with the screenshot sent to Minor Victim 1 when **BJARNASON** provided proof of funds "from my account that I primarily use for these kinds of arrangements." Transactions on the account include frequent transactions through online payment apps such as PayPal, Venmo, CashApp, and Zelle. Several of the small dollar online payments contain memos with apparent female names on them. Based on the facts presented above and my training and experience, I believe this may be consistent with payment for sexually explicit images of possible victims.

### **CONCLUSION**

18.      This investigation remains ongoing as are victim identification efforts. Based on the foregoing, I submit there is probable cause as charged in the proposed criminal complaint that **AARON EUGENE BJARNASON**, in the Middle District of Tennessee and elsewhere, has violated 18 U.S.C. §§ 2251(a) and (e), 18 U.S.C. §§ 2261A(2)(B) and 2261B, and 18 U.S.C. § 875(d). Accordingly, I request that a warrant issue for the arrest of **AARON EUGENE**

**BJARNASON** that he may be brought before this Court.